

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

In re:  BRIAN A. TANGUY  Debtor	Chapter 7 Docket No.: 25-10096 JEB
BRIAN STROUT, KERRI STROUT  Plaintiffs  v.  BRIAN A. TANGUY  Defendant	Adversary Proceeding No.: 25-01056 JEB

**PARTIES' RULE 26(f) CERTIFICATION, JOINT  
DISCOVERY REPORT AND PROPOSED DISCOVERY PLAN**

Pursuant to this Court's Order dated July 1, 2025 and Fed. R. Civ. P. 26 (f), made applicable to these proceedings through Federal Rule of Bankruptcy Procedure 7026, the Plaintiffs, Brian and Kerri Strout (the "Plaintiffs"), and the Defendant, Brian Tanguy (the "Defendant"), by their undersigned counsel, propose the following Discovery Plan:

1. The Parties will serve upon one another their Initial Disclosures on or before July 22, 2025.
2. All motions to amend pleadings, add additional parties, or assert third party actions shall be filed by July 30, 2025.
3. All written discovery shall be completed by September 15, 2025. Depositions may be conducted while written discovery requests are outstanding.
4. All depositions shall be completed by the Parties by October 1, 2025.

5. Dispositive Motions, if any, shall be filed by November 15, 2025.

6. The parties shall file their joint pretrial memorandum by December 1, 2025.

**JOINT DISCOVERY REPORT**

7. The parties anticipate conducting discovery on all claims and allegations raised in the pleadings.

8. In the event that the parties determine that discovery will involve significant Electronically Stored Information (“ESI”) they will attempt to negotiate a mutually agreeable protocol for ESI discovery or seek the Court’s assistance at such time as they reach an impasse.

9. The Parties estimate that the trial of this action would take two (2) days.

10. The parties agree that this Court has the authority to enter a final order as to all matters in dispute, and each party consents to the entry of final judgment or orders on all such matters.

**CERTIFICATION PURSUANT TO RULE 26 (f)**

The undersigned counsel for the parties hereby certify that on July 14, 2025, they conducted a conference pursuant to Fed. R. Civ. P. 26 (f) respecting the nature of the within action, the defenses asserted, potential settlement options and the discovery to be required. The parties have further discussed and agreed upon a proposed Discovery Plan which is filed herewith. The parties respectfully request that the Court approve the within proposed discovery plan, and order such other relief as the Court deems appropriate.

Dated: July 11, 2025

Respectfully submitted,  
Brian and Kerri Strout, Plaintiff  
By their attorney:

/s/ Christopher Fein  
Christopher Fein, Esq., BBO:654403  
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Braintree, Massachusetts 02184  
Tel: 781-356-5555  
[cjfein@feinlawoffice.com](mailto:cjfein@feinlawoffice.com)

Dated: July 14, 2025

Respectfully submitted,  
Brian Tanguy, Defendant  
By his attorney:

/s/ Scott J. Fishman  
Scott J. Fishman, Esq., BBO: 630711  
Jennings, Jennings, & Fishman  
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Weymouth, Massachusetts 02189  
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[scottfishman@jeningsfishman.com](mailto:scottfishman@jeningsfishman.com)

CERTIFICATE OF SERVICE

I, Christopher Fein, hereby certify that on the below date I caused the within Joint Discovery Plan to be served on the following parties by first class mail, postage prepaid, unless some other manner of service is indicated:

VIA ECF:

Scott J. Fishman, Esq.

Dated: July 14, 2025

Respectfully submitted,

/s/ Christopher Fein

Christopher J. Fein, Esq., BBO: 654403